

IN RE:	:	
CHARLES R. JOHNSON	:	CASE NO. 1:16-bk-002830-HWV
Debtor	:	
	:	
SANTANDER CONSUMER USA INC.	:	CHAPTER 13
Movant	:	
	:	
v.	:	
	:	
CHARLES R. JOHNSON	:	
Respondent	:	

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D. Admitted in part and denied in part. Debtor has no knowledge as to the Net Loan Balance. Strict proof is demanded. It is admitted that Debtor is paying the claim through his Chapter 13 Plan. The arrearage to the Trustee is also admitted. Debtor will deliver funds to counsel by the end of January 2023 sufficient to bring the Trustee current.

5. Admitted in part and denied in part. Santander is adequately provided in that the value of the vehicle is significantly more than the amount owed on same. Further, as stated above, Debtor will bring the Trustee current in the near future. Proof of insurance is attached.

**WHEREFORE**, Debtor respectfully requests that this Honorable Court issue an Order denying the Motion for Relief From Stay.

Respectfully submitted,



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Attorney for Debtor

DATED: 1/23/23

**CERTIFICATION OF SERVICE**

I, Carol V. Shay, Paralegal, do hereby certify that I have served a copy of the foregoing DEBTOR'S RESPONSE TO MOTION OF SANTANDER CONSUMER USA INC. FOR RELIEF FROM THE AUTOMATIC STAY upon the following persons by E-Service or by United States Mail, first class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania, addressed to:

JACK N. ZAHAROPOULOS, ESQUIRE  
CHAPTER 13 TRUSTEE  
VIA E-SERVICE

WILLIAM E. CRAIG, ESQUIRE  
MORTON & CRAIG LLC  
COUNSEL FOR MOVANT  
VIA E-SERVICE

IMBLUM LAW OFFICE, P.C.

*Carol V. Shay*

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DATED: 1/23/2023